



State of Ohio Environmental Protection Agency

**Northeast District Office**

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Twinsburg, Ohio 44087

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www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

July 20, 2007

RE: Columbiana County  
Village of Leetonia  
Sewage Sludge Inspection

**NOTICE OF VIOLATION**

Mr. Artie Altomare, Mayor  
Village of Leetonia  
300 East Main Street  
Leetonia, Ohio 44431-1197

Dear Mayor Altomare:

On July 12, 2007, a sewage sludge inspection was conducted in order to determine compliance with Ohio Administrative Code (OAC) Rule 3745-40, Ohio's sewage sludge rules, at the Village of Leetonia's wastewater treatment plant (WWTP). Mr. Butch Donnalley, Superintendent, was present during the sewage sludge inspection and provided information regarding the WWTP's sewage sludge operations and records. The sewage sludge inspection consisted of a review of the WWTP's contact information, completion of a compliance checklist, a review of the WWTP's sewage sludge records, and a walkthrough of the WWTP sewage sludge treatment units. The following deficiencies were discovered:

- According to Mr. Donnalley, sewage sludge has not been removed from the WWTP since 1990. I inquired as to how sewage sludge is handled at the WWTP. Mr. Donnalley stated that sewage sludge from the aerobic digester is pumped to the drying beds. After drying the sewage sludge, the sewage sludge is then stockpiled onsite directly adjacent to the sewage sludge drying beds. According to OAC Rule 3745-40-02, the sewage sludge stockpile constitutes surface disposal, which is not authorized. Within thirty (30) days of receiving this Notice of Violation (NOV) letter, the stockpiled sewage sludge must be properly disposed of by performing one of the following corrective actions:
  1. Haul the sewage sludge to a licensed landfill that is authorized to accept such materials for disposal;
  2. Land apply the sewage sludge only if the pathogen reduction (PR), vector attraction reduction (VAR), and metal concentrations requirements satisfy

- OAC Rule 3745-40 (Note: land application sites must be authorized by Ohio EPA prior to land application of sewage sludge); or
3. Haul the sewage sludge to another NPDES permitted WWTP that will accept the material.

Once proper disposal of sewage sludge occurs, the WWTP must provide written notification to Ohio EPA, which must contain the following information:

4. The quantity of sewage sludge that was properly disposed in dry tons;
  5. The date the sewage sludge was properly disposed of;
  6. Any analytic results from monitoring the stockpiled sewage sludge; and
  7. The contact information of the facility or authorized field identification number where the sewage sludge was properly disposed of.
- If land application of the WWTP's sewage sludge is to occur, the sewage sludge must satisfy the PR, VAR, and metal concentration requirements at the time of land application. The WWTP must perform monitoring for the following parameters: PR, VAR, Arsenic, Cadmium, Copper, Lead, Mercury, Molybdenum, Nickel, Selenium, and Zinc in order to verify that the sewage sludge metals are less than the pollutant ceiling concentrations. In addition, the WWTP must also provide documentation as to how the PR and VAR requirements have been satisfied prior to land application. Should the results show the metals exceed the pollutant ceiling concentrations or the PR and VAR requirements have not been satisfied, the sewage sludge must be disposed of in accordance with either item 1 or 3, provided above.
  - According to page 2-6 of the WWTP's sewage sludge management plan, which was received by Ohio EPA on March 8, 1990, "a total of 148 cubic yards (23.2 dry tons) of cake will be produced and land applied each year. Each time the six beds are cleaned, 37 cubic yards (5.8 dry tons) of cake is removed." The WWTP must immediately cease the sewage sludge stockpiling activities and begin complying with the WWTP's sewage sludge management plan and OAC Rule 3745-40 regarding the proper land application of sewage sludge.
  - Mr. Donnalley stated that the WWTP currently does not have any authorized sewage sludge sites to properly dispose of treated sewage sludge. Ohio EPA records confirm this statement. The WWTP will need to submit completed "sludge site authorization packets for non-EQ sewage sludge (sludge site authorization packet)" to Ohio EPA for any agricultural field that will be utilized for land application of sewage sludge. OAC Rule 3745-40-03(K) requires sewage sludge site authorizations be obtained from Ohio EPA prior to the land

application of sewage sludge. Additional copies of the sludge site authorization packet can be obtained from the following website:

[http://www.epa.state.oh.us/dsw/sludge/SLUJ\\_site\\_authorization\\_packet\\_s.pdf](http://www.epa.state.oh.us/dsw/sludge/SLUJ_site_authorization_packet_s.pdf)

- Part II.S of the WWTP's NPDES permit, No. 3PB00017\*GD, requires that "not later than January 31<sup>st</sup> of each calendar year, the permittee shall submit two (2) copies of a report summarizing the sludge disposal and/or reuse activities of the facility during the previous year." The sewage sludge annual report requires the following information to be submitted:
  1. The amount of sewage sludge disposed of/reused in dry tons;
  2. The method of disposal/reuse;
  3. A summary of all analyses made of the sewage sludge, including any priority pollutant scans that may have been performed; and
  4. Problems encountered including any complaints received.

Ohio EPA records indicate that sewage sludge annual reports have not been submitted since 1996. Mr. Donnalley stated that since no sewage sludge was removed from the WWTP, he believed that sewage sludge annual reports were not required to be submitted to Ohio EPA. Even if no sewage sludge is removed from WWTPs, Ohio EPA still requires the submittal of sewage sludge annual reports. At the bottom of Table 1, located on page 1 of the sewage sludge annual report, permittees must circle the statement "circle if no sewage sludge was removed for use or disposal during the previous calendar year" and submit two (2) copies of sewage sludge annual report. Enclosed is a copy of Ohio EPA's sewage sludge annual report. Additional copies of the sewage sludge annual report can be obtained from the following website:

[http://www.epa.state.oh.us/dsw/sludge/annual\\_report.html](http://www.epa.state.oh.us/dsw/sludge/annual_report.html)

The WWTP must begin submitting sewage sludge annual reports in accordance with Part II.S of the WWTP's NPDES permit. Within fourteen (14) days of receiving this NOV, copies of the 2006 annual report must be submitted to Ohio EPA in accordance with Part II.S of the WWTP's NPDES permit.

- During the inspection, no records regarding sewage sludge treatment or disposal were available. The WWTP must immediately begin complying with the record retention requirements established within 3745-40-06.

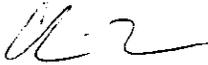
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The Village of Leetonia's sewage sludge disposal program was not in compliance with OAC Rule 3745-40. For your convenience, Ohio's sewage sludge rules are located at the following internet address:

<http://www.epa.state.oh.us/dsw/sludge/biosolid.html>

Within fourteen (14) days of receiving this inspection letter, please submit a written response as to how the Village of Leetonia will address the above deficiencies. Should you have any questions regarding the sewage sludge inspection, please contact me at your earliest convenience at (330) 963-1118.

Sincerely,



Chris Moody  
Environmental Specialist  
Division of Surface Water

CM:bo

enclosure

cc: Butch Donnalley, Superintendent

ec: Jake Howdyshell, DSW-CO